

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Crystal G. Brown

Debtor(s)

**U.S. Bank, N.A., successor trustee to LaSalle Bank
National Association, on behalf of the holders of Bear
Stearns Asset Backed Securities I Trust 2006-HE10,
Asset-Backed Certificates Series 2006-HE10
Movant**

vs.

Crystal G. Brown

Respondent(s)

BK NO. 23-10104 MDC

Chapter 13

Hearing Date: 05/18/23

**OBJECTION OF U.S. BANK, N.A., SUCCESSOR TRUSTEE TO LASALLE BANK
NATIONAL ASSOCIATION, ON BEHALF OF THE HOLDERS OF BEAR STEARNS
ASSET BACKED SECURITIES I TRUST 2006-HE10, ASSET-BACKED
CERTIFICATES SERIES 2006-HE10
TO CONFIRMATION OF CHAPTER 13 PLAN**

U.S. Bank, N.A., successor trustee to LaSalle Bank National Association, on behalf of the holders of Bear Stearns Asset Backed Securities I Trust 2006-HE10, Asset-Backed Certificates Series 2006-HE10 (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On March 24, 2023, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$89,452.81.
2. Debtor's Plan provides for payment in the amount of \$48,049.43 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$41,403.38 and does not provide sufficient funding to pay said claim including present value interest.
4. The Secured Creditor holds a first mortgage on the Debtor's property located at 967 West Main Street, Coatesville, PA, 19320, and the "cramdown" impermissibly attempts to modify the Secured Creditor's claim in violation of 11 U.S.C. 1322 (b) (2).
5. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
6. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, U.S. Bank, N.A., successor trustee to LaSalle Bank National Association, on behalf of the holders of Bear Stearns Asset Backed Securities I Trust 2006-HE10, Asset-Backed Certificates Series 2006-HE10, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: May 8, 2023

By: /s/Denise Carlon
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